

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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| UNITED STATES OF AMERICA | : | CRIMINAL NO. _____ |
| v. | : | DATE FILED: _____ |
| NYENE BAKER, | : | VIOLATIONS: |
| a/k/a “Jason Anderson,” | : | 21 U.S.C. § 846 (conspiracy to distribute |
| a/k/a “Unsco” | : | 500 grams or more of cocaine – 1 count) |
| | : | 21 U.S.C. § 841(a)(1) (possession with |
| | : | intent to distribute 500 grams or more of |
| | | cocaine–1 count) |

INDICTMENT

THE GRAND JURY CHARGES THAT:

1. From at least on or about July 31, 2009 through on or about August 4, 2009, in the Eastern District of Pennsylvania, and elsewhere, defendant

**NYENE BAKER,
a/k/a “Jason Anderson,”
a/k/a/ “Unsco,”**

conspired and agreed, with R. E. and J. H., charged elsewhere and others known and unknown to the grand jury, to knowingly and intentionally possess with intent to distribute 500 grams or more, that is, approximately three kilograms, of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(B).

MANNER AND MEANS

It was a part of the conspiracy that:

2. Defendant NYENE BAKER, R.E., and J.H. agreed that R.E. and J.H. would transport \$70,000 in bulk cash to Los Angeles, California, that defendant BAKER and

J. H. would obtain approximately three kilograms of cocaine from a supplier in the Los Angeles area, and that at the direction of defendant BAKER, R.E. and J.H. would conceal and transport the cocaine on a plane flight back to Philadelphia, after which they would deliver it to BAKER in New Jersey.

OVERT ACTS

In furtherance of the conspiracy and to accomplish its objects, defendant NYENE BAKER, and others known and unknown to the grand jury, committed the following overt acts, among others, in the Eastern District of Pennsylvania and elsewhere:

On or about August 1, 2009:

1. Defendant NYENE BAKER provided approximately \$3,400 in cash to R.E. and caused the deposit of that cash into a Wachovia bank account in Trenton, New Jersey.
2. In Trenton, New Jersey, defendant NYENE BAKER, deposited approximately \$660 into his Bank of America bank account.
3. At J.H.'s residence in Trenton, New Jersey, defendant NYENE BAKER, J.H., and R. E. used a laptop computer to make airline reservations to fly from Philadelphia International Airport and Baltimore Washington International Airport to Los Angeles International Airport on or about August 1, 2009. Defendant NYENE BAKER's reservation was made in the alias name "Jason Anderson." Payment for the tickets was made out of the Wachovia bank account identified in Overt Act #1.
4. Defendant NYENE BAKER, J.H., and R.E. went to a Forman Mills store in Trenton, New Jersey to purchase large-size clothing in order to conceal the transportation of bulk cash and bulk cocaine at airports and on an airplane.

On or about August 2, 2009:

5. After obtaining approximately \$70,000 in cash from defendant NYENE BAKER, J.H. and R.E. went to a room at the Holiday Express in Morrisville, Pennsylvania, where they concealed on their bodies approximately \$70,000 in bulk cash wrapped in cellophane.

6. Defendant NYENE BAKER boarded an AirTran Airlines flight in Baltimore, Maryland, using the alias name "Jason Anderson," and flew to Los Angeles, California.

7. Defendant NYENE BAKER rented a car at Dollar Rent-A-Car near Los Angeles International Airport, and paid for it using a check card drawn on his Bank of America bank account.

8. Defendant NYENE BAKER rented a room in his alias name, "Jason Anderson," at a Best Western Hotel near Los Angeles.

9. After J.H. and R.E. took a flight from Philadelphia International Airport to Los Angeles with \$70,000 concealed on their bodies, they met defendant NYENE BAKER in Los Angeles, and delivered the cash to him.

On or about August 3, 2009:

10. Defendant NYENE BAKER and J.H. obtained approximately three kilograms of bulk cocaine in the Los Angeles area.

11. Defendant NYENE BAKER, J.H. and R.E. packaged and concealed the bulk cocaine inside the Best Western Hotel room in the Los Angeles area.

On or about August 4, 2009:

12. Defendant NYENE BAKER, J.H. and R.E. purchased tickets on Southwest Airlines to fly from Los Angeles to Philadelphia International Airport, and paid for

the tickets using the same Wachovia account identified in Overt Act #1.

13. Defendant NYENE BAKER accompanied J.H. and R.E. on Southwest Airlines flights from Los Angeles, California to Chicago and then to Philadelphia. J.H. and R.E. carried approximately three kilograms of cocaine concealed on their bodies on that flight.

14. After arriving at Philadelphia International Airport with the bulk cocaine, J.H. and R.E. transported the cocaine in a vehicle and drove it from the airport toward New Jersey on Interstate 95, with the intention of meeting defendant NYENE BAKER in New Jersey to deliver the cocaine to him.

All in violation of Title 21, United States Code, Section 846.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

_____ 1. Paragraph 1, and Overt Acts 1 through 14 of Count One of this indictment are incorporated here.

2. On or about August 4, 2009, in Bristol Township, Bucks County, in the Eastern District of Pennsylvania and elsewhere, defendant

**NYENE BAKER,
a/k/a “Jason Anderson,”
a/k/a/ “Unsco,”**

knowingly and intentionally possessed with intent to distribute, and aided and abetted and wilfully caused the possession with intent to distribute of, 500 grams or more, that is, approximately three kilograms, of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(B), and Title 18, United States Code, Section 2. _____

A TRUE BILL:

GRAND JURY FOREPERSON

MICHAEL L. LEVY
United States Attorney